

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Derek E. Ladley	:	Chapter 13
Kimberly A. Ladley	:	
	:	
Debtor (s)	:	Case No.: 14-19842 AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtors, by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about December 16th, 2014.
2. The Chapter 13 filing was assigned case number 14-19842 AMC.
3. On or about July 9th, 2015, this Honorable Court confirmed the Debtors' Chapter 13 Plan.
4. Subsequent to Confirmation, Debtors applied for and was approved for a loan modification of their first mortgage with New Penn Financial LLC d/b/a Shellpoint Mortgage Servicing ("mortgagee"). Please see approved loan modification attached here as "**Exhibit A.**"
5. Said loan modification is financially beneficial to the Debtors and in no way adverse to the Bankruptcy estate.
6. At this time, the Debtors are in need of a modification of their confirmed Chapter 13 Plan in order to remove pre-petition mortgage arrears that no longer need to be paid to the mortgagee.
7. Debtors have drafted, and will file a modified Chapter 13 Plan, which shall pay back the allowed and filed unsecured creditors 100%, and remove the pre-

petition arrears initially due to the mortgagee. Please see attached modified Plan marked as "**Exhibit B.**"

WHEREFORE, the Debtors request that they be permitted to modify their Chapter 13 Plan for the above stated reasons.

Dated: March 14, 2018

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
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